

State of Rhode Island Public Utilities Commission

**In Re: Petition of the Episcopal Diocese of Rhode Island for Declaratory Judgment
on Transmission System Costs and Related “Affected System Operator” Studies**

Docket No. 4981

Pre-Filed Testimony of

Dennis Burton

May 25, 2021

I. Introduction and Qualifications

1 **Q. Please state your name and business address.**

2 A. My name is Dennis Burton and my business address is 275 North Main Street,
3 Providence, Rhode Island 02903.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am the Chief Financial Officer of the Episcopal Diocese of Rhode Island.

6 **Q. What is the Diocese?**

7 A. The Episcopal Diocese of Rhode Island is a subsidiary body of the Episcopal Church
8 in the United States of America, encompassing the state of Rhode Island. It is one of
9 seven New England dioceses that make up Province 1. The bishop is the Right Reverend
10 W. Nicholas Knisely, the thirteenth office holder. Today there are 51 parishes in the
11 diocese, with more than 17,000 communicants.

12 **Q. What is the purpose of the solar project the Diocese intends to build in
13 Gloucester?**

14 A. This planned project is located on the grounds of the Episcopal Conference Center and
15 Camp in Gloucester. The purpose of the Project is to generate rent revenue to support the
16 Diocese's summer camp for disadvantaged youth, which operates with an annual deficit
17 in excess of \$250,000, while providing net metering credits to all our parishes and other
18 non-profit, religious organizations in Rhode Island in fulfilling the Diocese's mission of
19 Creation Care.

20 **Q. Please describe the solar project.**

1 A. The Diocese intended to develop two solar projects on the camp property, the Eastern
2 and Western Arrays, together the “projects.” The Diocese intended to use about 40 acres
3 of remote portions of the Diocese property that consists altogether of approximately 186
4 acres of former farmland. The Project was designed as two solar sites because the land is
5 bifurcated by Reservoir Road. However, due to electric grid capacity limitations and
6 unplanned incremental inter-connection cost and delays, the project was scaled down to
7 one smaller array projected to generate 2.2 megawatts of electricity rather than
8 approximately 10 megawatts submitted with the original interconnection application.
9 The revised solar array will not be visible from any public space or neighbor.

10 **Q. With regard to the project, what is the Diocese’s mission of creation care?**

11 A. Adherence to social and environmental “best practices” is considered to be a goal of
12 equal importance to the project’s commercial viability. Success is not just minimizing
13 negative environmental and social consequences but gaining advantages that honor God’s
14 commitment to providing mankind with a sustainable, healthy planet. The project will
15 enhance Rhode Island’s natural ecosystems and contribute to overall carbon reduction
16 goals. This project will help reduce Rhode Island’s carbon footprint: taking into account
17 lifecycle greenhouse gas emissions, solar generation produces only 10% of natural gas’s
18 carbon emissions—which is Rhode Island’s current primary power source—and less than
19 5% of coal’s carbon emissions per kWh of energy production (NREL). To the Diocese
20 that is considered to be a goal of equal importance to the project’s commercial viability.

21 **Q. How will the solar project serve that mission?**

1 A. It is meant to provide net metering credits to all our parishes and educational and
2 administrative buildings and possibly to other non-profit, religious organizations in
3 Rhode Island. The project is intended to be a model for additional renewable energy
4 development projects that will help religious organizations across the state by reducing
5 their energy bills and ensuring that their energy supply is CO2 neutral. Most importantly,
6 the project has been designed with the utmost respect and care for the environment.
7 Environmental strategies for project development include: mitigating tree removal by
8 planting replacement trees for those that are cut, planting bee and bird-friendly native
9 wildflowers between modules, no removal of soil from the site, minimizing soil
10 disturbance, wetland buffer plantings, and continued wildlife monitoring. A robust
11 removal and restoration plan has been agreed with the developer to ensure removal of all
12 equipment and return the site to a pre-construction habitat.

13 **Q. What is the history and purpose of the Camp?**

14 A. The Episcopal Camp and Conference Center sits on 186 acres of land that straddle the
15 town line between Burrillville (the village of Pascoag) and Glocester (the village of
16 Chepachet) in northwest Rhode Island along the shore of Echo Lake. The land had been
17 entirely cleared and farmed since colonial times. Judge James Harris, upon his death in
18 1947, left the entire property to the Diocese, stipulating that it must be used either as a
19 place of recreation and retreat for young people, or as a respite for the elderly. In 1949
20 the first work projects began on the property where teenagers from around the diocese
21 cleared land and built camp buildings. From 1949 to 1965, Canon Parshley served as the
22 director of the ministry, an active summer ministry supplemented by year-round

1 conferences for young people and a place where “Worship, work and play join together
2 so you don’t know where one ends and the other begins.” More than 50,000 young
3 people in Rhode Island have taken part in the ministry of ECC since its inception and 400
4 per year participate in camp activities. It has been a core value of the camp to be
5 accessible for all people, regardless of their financial status, and as a result the camp has
6 never been self-sustaining. As the trends of religious life continue to change in this
7 country, the Diocese has explored ways to generate incremental revenue. When ECC
8 began the strategic planning process in 2016, one of the clear goals was to reach financial
9 sustainability and to secure the future of the camp. When it was suggested the camp
10 explore using some of the many unused acres of land for solar energy, the team entrusted
11 with the planning process eagerly considered the option. Careful planning ensued and it
12 became clear that using a portion of the acreage at ECC for solar would provide a robust,
13 non-intrusive revenue stream that could close the budget gap and help secure the
14 financial future of the camp while providing educational benefits to the community and
15 cost savings to religious and social organizations in the state.

16 **Q. How will the solar project help the Camp?**

17 A. The Camp operates with an annual deficit in excess of \$250,000 and the anticipated
18 lease revenue from the project would greatly bolster the Diocese’s ability to continue
19 operating the Camp. The Diocese is financially challenged to continue to operate its
20 camp at a deficit and needs the lease revenue from this project to supplement income to
21 the camp.

22 **Q. What is the role of RER Energy on the Project?**

1 A. The Diocese issued a request for proposals for capable renewable energy developers
2 and selected RER as the best qualified to team with the Diocese to develop the project
3 and meet its goals. RER Energy provides the development, construction and financial
4 arranging for the project, and has a high degree of corporate awareness and respect for
5 community organizations.

6 **Q. Please describe the history of this Project to date.**

7 A. The idea of a solar project as a strategy to raise funds to save the camp while
8 honoring God's commandment to creation care arose in a strategic planning process in
9 2016. After much consideration and discernment, the Diocese searched for advisors both
10 within and outside the communicant community. During 2017 we organized a Solar
11 Advisory Committee to support and guide our journey. We interviewed twelve
12 companies and allowed six of them to make proposals. After six months of a competitive
13 solicitation process we signed an MoU with RER Energy Group, the firm that best
14 understood our creation care mission. With RER taking the lead, we submitted the
15 proper planning and zoning applications to the township of Gloucester in mid 2018,
16 securing those critical permits in February of 2019. Meanwhile, we struggled to gain a
17 clear response to our applications to NGrid for interconnection.

18 **Q. Would you please summarize the Diocese's experience with the solar farm
19 development process?**

20 A. The process we have endured over the past four years will hopefully, but
21 unfortunately, result in a much scaled-down solar array achieving interconnection in
22 2023, six years from our launch of the plan. During the development process in

1 conjunction with the solar developer, RER Energy, we have encountered many
2 challenges to pursue our goals to lower carbon emissions, be a role model for supporting
3 renewable energy, generate income for our camp property, and reduce energy costs for
4 our churches through the Rhode Island Virtual Net Metering program. With many of the
5 delays in our project associated with the Interconnection process and ISO study, we
6 decided to approach the PUC for assistance with mediation to resolve issues that put our
7 project in jeopardy and did not appear to have a path to resolution by working directly
8 with National Grid.

9 **Q. Please summarize the Diocese's experience with your petition for declaratory**
10 **judgments?**

11 A. The Diocese respects the authority and integrity of the State Agencies that have
12 managed and advocated in this dispute. We do not question the integrity or ethics of any
13 individuals. It is the process and outcome in resolving mediation that raised our concern.
14 Specifically, we anticipated the presentation of oral arguments which was effectively the
15 culmination of a year-long mediation process to allow a presentation by each side, the
16 Diocese and National Grid, of their respective oral arguments. When our counsel was
17 interrupted shortly after beginning his oral argument by PUC Counsel raising questions
18 and making counterpoint statements to our argument, it was surprising. I would have
19 expected to hear the counterarguments coming from National Grid's opposing counsel
20 because they struck me as oppositional advocacy. The PUC certainly has every right to
21 make a determination that sides completely or partially with one or the other party, but

1 we expected a neutral decisionmaker taking argument from the advocates, and we
2 experienced something dramatically different than our expectation.

3 **Q. Why did the Diocese appeal the Commission's decision?**

4 A. As advocates for renewable energy that results in a lower carbon footprint, we
5 appealed the PUC decision to the Rhode Island Supreme Court out of concern for the
6 PUC's logic and process. We have heard from multiple parties the current grid system is
7 antiquated having been designed for uni-directional distribution of energy from large,
8 centralized energy generation plants which cannot easily accommodate a bi-directional
9 distributed energy supply system. Our project, located in the Northwestern portion of the
10 State, was going to be charged for upgrades to a remote sub-station and the addition of
11 three phase power lines running to the station at a cost that would make the project
12 financially unfeasible as all of the cost of the upgrades would be assigned to our project
13 and developer. Additionally, an ISO study was unexpectedly launched which had the
14 potential to add additional costs to the project after we were well into the development
15 process with our developer having already incurred significant costs. As a result of the
16 interconnection sub-station capacity limitations we were forced to downsize our array to
17 accommodate the current maximum capacity of the sub-station. Fortunately, we did not
18 incur additional costs as a result of the ISO study, but we did experience significant
19 delays to the process and we remain concern that the PUC's decision will thwart Rhode
20 Island's clean energy goals.

1 **Q. Please explain the specific policy concern regarding transmission system charges**
2 **and why the Diocese has resolved to continue its appeal even after it was determined**
3 **that its project would not impact the transmission system.**

4 A. With all of the challenges we experienced, a key point we attempted to elevate to the
5 PUC during the oral arguments was our concern of solely charging developers with the
6 cost of improving the grid required to accommodate a single interconnection that exceeds
7 the capacity of the substation and lines. At the time of the proceeding we were unsure
8 whether National Grid would levy transmission system charges on our project and we
9 were concerned this precedent based policy of funding transmission grid upgrades would
10 effectively lead to small, local solar energy arrays being capped by the current capacity of
11 the transmission system far beyond the point of interconnection. By our understanding,
12 the transmission system is a regional system designed to move electricity long distances
13 for the benefit of all of our region's electrical customers, which is why it is regulated by
14 the federal government. It seemed fundamentally unfair and counter to our public policy
15 to assign the costs of upgrading that system directly to incremental, small solar projects
16 like ours. We were concerned that such a new policy would make many small
17 renewable energy projects economically unfeasible and would limit the ability to deliver
18 local renewable energy solutions that offer benefits to a grid properly designed for future
19 energy needs. We challenged the ability of an ISO study to halt projects and potentially
20 add additional interconnection costs further limiting the number of viable solar farm
21 projects.

22 **Q. What were the specific process related concerns?**

1 A. During the argument and in its Order, the PUC seemed to dismiss the Diocese
2 perspective as inconsequential without balanced consideration. It was very unexpected
3 and hugely disappointing to watch our counsel advocating the merits of our position not
4 only against National Grid counsel but also versus PUC Counsel. The counterpoints
5 presented by their two attorneys seemed to have been based entirely on precedent and
6 historical practice with no apparent willingness to consider the novelty of the issues
7 presented by our counter argument. We do not believe the argument based on precedent
8 will translate into a grid system that will have the capacity to support the fast growing
9 energy demands of our State. As advocates for renewable energy and having directly
10 experienced challenges bringing our solar farm on-line, we decided to appeal the PUC
11 decision as a vehicle to hopefully engage more substantive consideration of our concerns
12 raised in Docket 4981 and at least some appreciation of our perspective on the issues.

13 **Q. What are your concluding thoughts?**

14 A. We strongly endorse our State's leadership goal to become 100% renewable energy
15 sourced by 2030. We believe the demand versus supply of energy no longer reflects a
16 status quo precedent based market. We are concerned the demand for the generation of
17 new local energy in Rhode Island will outstrip the precedent founded argument for
18 funding the grid improvements. We remain confident the State agencies will guide the
19 transformation of our energy grid system to support 100% renewable energy sources that
20 will dramatically lower the carbon footprint in support of Creation Care and we are
21 hopeful the transformation will occur at a pace that meets the growing energy demand
22 from a legacy grid system.

1 **Q. Does this conclude your testimony?**

2 A. Yes.